PACHULSKI STANG ZIEHL & JONES LLP

Jeffrey N. Pomerantz (CA Bar No. 143717) (admitted pro hac vice) John A. Morris (NY Bar No. 2405397) (admitted pro hac vice) Gregory V. Demo (NY Bar No. 5371992) (admitted pro hac vice) Hayley R. Winograd (NY Bar No. 5612569) (admitted pro hac vice) 10100 Santa Monica Blvd., 13th Floor Los Angeles, CA 90067

Telephone: (310) 277-6910 Facsimile: (310) 201-0760

HAYWARD PLLC

Melissa S. Hayward (Texas Bar No. 24044908) Zachery Z. Annable (Texas Bar No. 24053075) 10501 N. Central Expy, Ste. 106 Dallas, Texas 75231

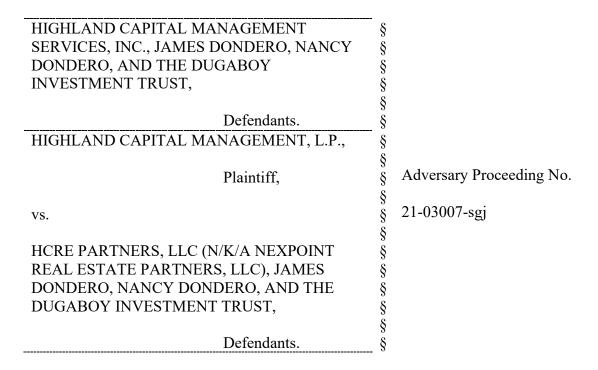
Telephone: (972) 755-7100 Facsimile: (972) 755-7110

Counsel for Highland Capital Management, L.P.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§
	§ Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P., 1	§ Case No. 19-34054-sgj11
Reorganized Debtor.	§ §
HIGHLAND CAPITAL MANAGEMENT, L.P.,	8
	8
Plaintiff,	S Adversary Proceeding No.
	§ 21 02005 ·
VS.	§ 21-03005-sgj
	§
NEXPOINT ADVISORS, L.P., JAMES	§
DONDERO, NANCY DONDERO AND THE	§
DUGABOY INVESTMENT TRUST,	§
	Š
Defendants.	§
HIGHLAND CAPITAL MANAGEMENT, L.P.,	8
inelizin a eri iiriz ivi i arezivizi (i, zii i,	8 8
Plaintiff,	8 Adversary Proceeding No.
	8
VS.	8 21-03006-sgj
vo.	8
	8

¹ The Reorganized Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Reorganized Debtor is 100 Crescent Court, Suite 1850, Dallas, TX 75201.



DECLARATION OF JOHN A. MORRIS IN SUPPORT OF HIGHLAND'S OBJECTION TO MOTION OF DEFENDANT NEXPOINT ADVISORS, L.P. TO EXTEND EXPERT DISCLOSURE AND DISCOVERY DEADLINES

I, John A. Morris, pursuant to 28 U.S.C. § 1746(a) and under penalty of perjury, declare as follows:

- 1. I am an attorney in the law firm of Pachulski, Stang, Ziehl & Jones LLP, counsel to the above-referenced Reorganized Debtor, and I submit this Declaration in support of Highland's Objection to Motion of Defendant NexPoint Advisors, L.P. to Extend Expert Disclosure and Discovery Deadlines (the "Objection") being filed concurrently with this Declaration. I submit this Declaration based on my personal knowledge and review of the documents listed below.
- 2. Attached as **Exhibit 1** is a true and correct copy of a 30-year term note on behalf of NexPoint Advisors, L.P. and in favor of Highland Capital Management, L.P. for an original principal amount of \$30,746,812.33, dated May 31, 2017.

Case 21-03005-sgj Doc 106 Filed 12/01/21 Entered 12/01/21 14:47:42 Page 3 of 3

3. Attached as **Exhibit 2** is a true and correct copy of a Demand Letter dated January

7, 2021.

4. Attached as **Exhibit 3** is a true and correct copy of the October 19, 2021 deposition

transcript of Frank Waterhouse.

5. Attached as **Exhibit 4** is a true and correct copy of the October 29, 2021 deposition

transcript of James Dondero.

Dated: December 1, 2021.

/s/ John A. Morris

John A. Morris